

## **EXHIBIT C**

## Phillip Rakhunov

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**From:** Alexander Sperber <asperber@lipsiuslaw.com>  
**Sent:** Friday, August 18, 2023 11:48 AM  
**To:** Phillip Rakhunov  
**Cc:** Avram Frisch; Yisroel Steinberg; Lauren Riddle  
**Subject:** Re: Kitchen Winners v. Rock Fintek - Deposition of Dimerco

Would September 12th work for Alex King's deposition?

I have still not been formally retained by Mr. Banon. I am following up with him again.

**Alexander J. Sperber**

**Lipsius-Benham Law LLP**

80-02 Kew Gardens Rd., Suite 1030 | Kew Gardens, NY 11415  
Direct: 212.981.8449 | Main: 212.981.8440 | Fax (888) 442-0284

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On Thu, Aug 17, 2023 at 12:47 PM Phillip Rakhunov <[prakhunov@psdfirm.com](mailto:prakhunov@psdfirm.com)> wrote:

Alex, have we confirmed a date for Alex King (Dimerco)?

Do you have confirmation that you are or are not representing Mr. Banon?

Thanks.

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**From:** Alexander Sperber <[asperber@lipsiuslaw.com](mailto:asperber@lipsiuslaw.com)>  
**Sent:** Friday, August 11, 2023 3:48 PM  
**To:** Phillip Rakhunov <[prakhunov@psdfirm.com](mailto:prakhunov@psdfirm.com)>  
**Cc:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>; Yisroel Steinberg <[ysteinberg@lipsiuslaw.com](mailto:ysteinberg@lipsiuslaw.com)>; Lauren Riddle <[lriddle@psdfirm.com](mailto:lriddle@psdfirm.com)>  
**Subject:** Re: Kitchen Winners v. Rock Fintek - Deposition of Dimerco

I am inquiring.

**Alexander J. Sperber**

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On Fri, Aug 11, 2023 at 2:49 PM Phillip Rakhunov <[prakhunov@psdfirm.com](mailto:prakhunov@psdfirm.com)> wrote:

Unfortunately that entire week is booked. Following week?

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**From:** Alexander Sperber <[asperber@lipsiuslaw.com](mailto:asperber@lipsiuslaw.com)>

**Sent:** Friday, August 11, 2023 2:34 PM

**To:** Phillip Rakhunov <[prakhunov@psdfirm.com](mailto:prakhunov@psdfirm.com)>

**Cc:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>; Yisroel Steinberg <[ysteinberg@lipsiuslaw.com](mailto:ysteinberg@lipsiuslaw.com)>; Lauren Riddle <[lriddle@psdfirm.com](mailto:lriddle@psdfirm.com)>

**Subject:** Re: Kitchen Winners v. Rock Fintek - Deposition of Dimerco

He also gave 9/6. Would both of you be available on that date?

**Alexander J. Sperber**

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On Fri, Aug 11, 2023 at 11:35 AM Phillip Rakhunov <[prakhunov@psdfirm.com](mailto:prakhunov@psdfirm.com)> wrote:

Did he give any other dates? I have to be in court on 9/5.

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**From:** Alexander Sperber <[asperber@lipsiuslaw.com](mailto:asperber@lipsiuslaw.com)>  
**Sent:** Friday, August 11, 2023 11:34 AM  
**To:** Phillip Rakhunov <[prakhunov@psdfirm.com](mailto:prakhunov@psdfirm.com)>  
**Cc:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>; Yisroel Steinberg <[ysteinberg@lipsiuslaw.com](mailto:ysteinberg@lipsiuslaw.com)>; Lauren Riddle <[lriddle@psdfirm.com](mailto:lriddle@psdfirm.com)>  
**Subject:** Kitchen Winners v. Rock Fintek - Deposition of Dimerco

Phil,

Alexander King of Dimerco has indicated that he would be available for his deposition on 9/5. Please let me know if that date would work for you.

Alex

**Alexander J. Sperber**

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## Phillip Rakhunov

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**From:** Alexander Sperber <asperber@lipsiuslaw.com>  
**Sent:** Thursday, August 31, 2023 7:23 PM  
**To:** Phillip Rakhunov  
**Cc:** Avram Frisch; Lauren Riddle  
**Subject:** Re: Kitchen Winners NY Inc. v. Rock Fintek LLC, Case 1:22-cv-05276-PAE

Would October 11th work for everyone for Mendel Banon's deposition?

**Alexander J. Sperber**

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On Fri, Aug 25, 2023 at 4:02 PM Alexander Sperber <[asperber@lipsiuslaw.com](mailto:asperber@lipsiuslaw.com)> wrote:

Let me find out.

Alex

**Alexander J. Sperber**

**Lipsius-Benhaim Law LLP**

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On Fri, Aug 25, 2023 at 3:27 PM Phillip Rakhunov <[prakhunov@psdfirm.com](mailto:prakhunov@psdfirm.com)> wrote:

The 27<sup>th</sup> does not work for me as I will be traveling for work.

Alex – can you please get us a couple of other dates?

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**From:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>

**Sent:** Friday, August 25, 2023 3:26 PM

**To:** Phillip Rakhunov <[prakhunov@psdfirm.com](mailto:prakhunov@psdfirm.com)>  
**Cc:** [asperber@lipsiuslaw.com](mailto:asperber@lipsiuslaw.com); Lauren Riddle <[lriddle@psdfirm.com](mailto:lriddle@psdfirm.com)>  
**Subject:** Re: Kitchen Winners NY Inc. v. Rock Fintek LLC, Case 1:22-cv-05276-PAE

No it doesn't. I will be away that day

Avi Frisch

The Law Office of Avram E. Frisch LLC

201-289-5352

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**From:** Phillip Rakhunov <[prakhunov@psdfirm.com](mailto:prakhunov@psdfirm.com)>  
**Sent:** Friday, August 25, 2023 3:24:49 PM  
**To:** Avram Frisch <[frischa@avifrischlaw.com](mailto:frischa@avifrischlaw.com)>  
**Cc:** [asperber@lipsiuslaw.com](mailto:asperber@lipsiuslaw.com) <[asperber@lipsiuslaw.com](mailto:asperber@lipsiuslaw.com)>; Lauren Riddle <[lriddle@psdfirm.com](mailto:lriddle@psdfirm.com)>  
**Subject:** FW: Kitchen Winners NY Inc. v. Rock Fintek LLC, Case 1:22-cv-05276-PAE

Avi – see below.

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**From:** Alexander Sperber <[asperber@lipsiuslaw.com](mailto:asperber@lipsiuslaw.com)>  
**Sent:** Friday, August 25, 2023 3:22 PM  
**To:** Phillip Rakhunov <[prakhunov@psdfirm.com](mailto:prakhunov@psdfirm.com)>  
**Cc:** Lauren Riddle <[lriddle@psdfirm.com](mailto:lriddle@psdfirm.com)>  
**Subject:** Re: Kitchen Winners NY Inc. v. Rock Fintek LLC, Case 1:22-cv-05276-PAE

No, not yet. Avi -- does the 21st work for you?

**Alexander J. Sperber**

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On Fri, Aug 25, 2023 at 2:57 PM Phillip Rakhunov <[prakhunov@psdfirm.com](mailto:prakhunov@psdfirm.com)> wrote:

Thanks. Assuming this is going forward on zoom, please hold the 21<sup>st</sup>. I took Mr. Banon off the email now that he is represented. Did you clear that date with Avi?

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**From:** Alexander Sperber <[asperber@lipsiuslaw.com](mailto:asperber@lipsiuslaw.com)>  
**Sent:** Friday, August 25, 2023 2:50 PM  
**To:** Phillip Rakhunov <[prakhunov@psdfirm.com](mailto:prakhunov@psdfirm.com)>  
**Cc:** Mendel Banon <[mendelbanon@gmail.com](mailto:mendelbanon@gmail.com)>; Lauren Riddle <[lriddle@psdfirm.com](mailto:lriddle@psdfirm.com)>  
**Subject:** Re: Kitchen Winners NY Inc. v. Rock Fintek LLC, Case 1:22-cv-05276-PAE

Phil,

I have now been retained to represent Mr. Banon in this matter.

Mr. Banon is available on the following dates for his deposition: Sep 21st and 27th

I am attaching objections to the subpoena on behalf of Mr. Banon. I am working on gathering responsive documents as quickly as possible.

Best,

Alex



**Alexander J. Sperber**

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On Wed, Aug 23, 2023 at 11:26 PM Phillip Rakhunov <[prakhunov@psdfirm.com](mailto:prakhunov@psdfirm.com)> wrote:

Mr. Banon,

This firm represents Rock Fintek LLC in the above captioned litigation against Adorama Inc. and Kitchen Winners NY Inc., among others.

As you know, you have been served with a subpoena in this matter seeking your appearance at a deposition on August 31 as well as the production of certain documents. A courtesy copy of the subpoena along with a copy of the proof of service is attached.

We understand that attorney Alexander Sperber, counsel for Adorama and Kitchen Winners, reached out to you regarding potential representation but has not been retained to represent you. Mr. Sperber is copied here out of an abundance of caution.

If there is any lawyer representing you with respect to the subpoena, please have them contact us right away to discuss scheduling.

If you do not plan on having a lawyer involved, please respond to this email or call me at my number below or my colleague Lauren Riddle at 617.960.3121 as soon as possible to discuss scheduling.

All rights and remedies are reserved.

Regards,

**PHILLIP RAKHUNOV**

**POLLACK SOLOMON DUFFY LLP**

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